

United States Courts
Southern District of Texas
FILED

JUN 16 2020 SCG

David J. Bradley, Clerk
Laredo Division

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

UNITED STATES OF AMERICA

v.

CRIMINAL NO. 20-CR-01315-S

MICHAEL THOMAS SAGENBRECHT
CHARLES PRESTON HANSFORD
JOHN BRENT REED
AUGUST ANTHONY SCHULTZ III
DAVID BELL
BILL SHEPARD
BRANDON JAMMOL OWENS

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SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about **between March 18, 2020 and May 28, 2020**, in the Southern District of Texas
and within the jurisdiction of the Court, Defendants,

**MICHAEL THOMAS SAGENBRECHT and
CHARLES PRESTON HANSFORD,**

did knowingly conspire and agree with each other and with other persons known and unknown to
the grand jurors, to conceal, harbor and shield from detection, in any place, including any building
and any means of transportation, an alien who had come to, entered, and remained in the United
States in violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii)
and (v)(I).

COUNT TWO

On or about **March 18, 2020**, in the Southern District of Texas and within the jurisdiction
of the Court, Defendant,

MICHAEL THOMAS SAGENBRECHT,

knowing and in reckless disregard of the fact that HERMILO RODRIGUEZ-RODRIGUEZ was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor and shield from detection, and attempt to conceal, harbor and shield from detection, such alien, in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

COUNT THREE

On or about **March 18, 2020**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

MICHAEL THOMAS SAGENBRECHT,

knowing and in reckless disregard of the fact that LEONARDO ALCANTARA-RODRIGUEZ was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor and shield from detection, and attempt to conceal, harbor and shield from detection, such alien, in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

COUNT FOUR

On or about **May 27, 2020**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

MICHAEL THOMAS SAGENBRECHT,

knowing and in reckless disregard of the fact that JAVIER PALACIOS-PALACIOS was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor and shield from detection, and attempt to conceal, harbor and shield from detection, such

alien, in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

COUNT FIVE

On or about **May 28, 2020**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

CHARLES PRESTON HANSFORD,

knowing and in reckless disregard of the fact that GIOVANI LAURIANO-BRAVO was an alien who had come to, entered, and remained in the United States in violation of law, did conceal, harbor and shield from detection, and attempt to conceal, harbor and shield from detection, such alien, in any place, including any building and any means of transportation, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

COUNT SIX

From on or about **March 18, 2020 through May 28, 2020**, in the Southern District of Texas and within the jurisdiction of the Court, Defendants,

**MICHAEL THOMAS SAGENBRECHT,
CHARLES PRESTON HANSFORD,
JOHN BRENT REED,
AUGUST ANTHONY SCHULTZ III,
DAVID BELL,
BILL SHEPARD and,
BRANDON JAMMOL OWENS,**

did knowingly conspire and agree with other persons known and unknown to the grand jurors, to transport and move and attempt to transport and move within the United States by means of transportation and otherwise, an alien who had come to, entered, and remained in the United States

in violation of law, in furtherance of such violation, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and (v)(I).

COUNT SEVEN

On or about **May 20, 2020**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

BRANDON JAMMOL OWENS,

knowing and in reckless disregard of the fact that GERARDO GOMEZ-SALINAS, was an alien who had come to, entered, and remained in the United States in violation of law, did transport and move and attempt to transport and move such alien, within the United States, by means of transportation and otherwise, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

COUNT EIGHT

On or about **May 20, 2020**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

BRANDON JAMMOL OWENS,

knowing and in reckless disregard of the fact that ELIA ALBETER-BLAS, was an alien who had come to, entered, and remained in the United States in violation of law, did transport and move and attempt to transport and move such alien, within the United States, by means of transportation and otherwise, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii)

COUNT NINE

On or about **May 27, 2020**, in the Southern District of Texas and within the jurisdiction of

the Court, Defendant,

MICHAEL THOMAS SAGENBRECHT,

knowing and in reckless disregard of the fact that LUZ JOSUE CORONA-ORTIZ, was an alien who had come to, entered, and remained in the United States in violation of law, did transport and move and attempt to transport and move such alien, within the United States, by means of transportation and otherwise, in furtherance of such violation of law, for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

COUNT TEN

On or about **May 27, 2020** in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

MICHAEL THOMAS SAGENBRECHT,

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition, to wit, HS Produkt (Springfield Armory), model XD-40, .40 caliber pistol bearing serial number GM131197; Kimber, Model Crimson Carry II, .45 Caliber pistol bearing serial number K437060; Rock River Arms, model LAR-15, 5.56 millimeter rifle bearing serial number CM301443; 27 rounds of .45 caliber ammunition; 10 rounds of .40 caliber ammunition; 63 rounds of .223 caliber ammunition; 20 rounds of 9 millimeter ammunition; and the firearm and ammunition were in and affecting commerce, in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF FORFEITURE

**8 U.S.C. §1324,
Conspiracy to Harbor, and Harboring an undocumented alien**

(Count 1-5)

Title 18, United States Code Section 982(a)(6), the United States gives notice to the Defendants,

**MICHAEL THOMAS SAGENBRECHT and
CHARLES PRESTON HANSFORD,**

that upon conviction of the offense of conspiracy to harbor or conceal undocumented alien or harboring or concealing an undocumented alien as charged in Counts 1-5 of the Indictment, the Defendant shall forfeit to the United States:

- i. any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense, and
- ii. Any property, real or personal-
 - (I) That constitutes or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of convictions, or
 - (II) That is used to facilitate, or is intended to be used to facilitate, the commission of the offense of conviction.

**8 U.S.C. §1324,
Conspiracy to Transport, and transporting an undocumented alien
(Counts 6-9)**

Pursuant to Title 8, United States Code, Section 1324(b) and Title 28, United States Code Section 2461(c), the United States gives notice to the Defendants,

**MICHAEL THOMAS SAGENBRECHT,
CHARLES PRESTON HANSFORD,
JOHN BRENT REED,
AUGUST ANTHONY SCHULTZ III,
DAVID BELL,
BILL SHEPARD and,**

BRANDON JAMMOL OWENS,

that upon conviction of the offense the Defendants shall forfeit to the United States any conveyance that has been used in the commission of said offense, the gross proceeds of such offense, and any property traceable to such conveyance or proceeds.

**18 U.S.C. §922(g)
(Count 10)**

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendant,

MICHAEL THOMAS SAGENBRECHT,

that upon conviction of a violation of Title 18, United States Code, Section 922(g), all firearms/ammunition involved in said violation are subject to forfeiture, including but not limited to the following:

- (1) HS Produkt (Springfield Armory), model XD-40, .40 caliber pistol bearing serial number GM131197;
- (2) Kimber, Model Crimson Carry II, .45 caliber pistol bearing serial number K437060;
- (3) Rock River Arms, model LAR-15, 5.56 millimeter rifle bearing serial number CM301443;
- (4) 27 Rounds – .45 caliber ammunition;
- (5) 10 rounds – .40 caliber ammunition;
- (6) 63 rounds – .223 caliber ammunition; and
- (5) 20 rounds – 9 millimeter ammunition.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

RYAN K. PATRICK
UNITED STATES ATTORNEY


Paul Harrison
Assistant United States Attorney

FOREMAN OF THE GRAND JURY

USA-74-24b
(Rev. 6-1-71)

CRIMINAL DOCKET

LAREDO DIVISION

NO. 20-CR-01315-S

FILE: 20-07568 MAG#: 20-01135
SUPERSEDING INDICTMENT

Judge: MARINA GARCIA MARMOLEJO

ATTORNEYS:

UNITED STATES OF AMERICA

RYAN K. PATRICK, USA
PAUL HARRISON, AUSA

VS.

MICHAEL THOMAS SAGENBRECHT
CHARLES PRESTON HANSFORD
JOHN BRENT REED
AUGUST ANTHONY SCHULTZ III
DAVID BELL
BILL SHEPARD
BRANDON JAMMOL OWENS

CHARGES:

Count.1: Conspiracy to conceal, harbor or shield an undocumented alien
[8 USC 1324 (a)(1)(A)(iii) and (v)(I)]
Counts. 2-5: Conceal, harbor or shield an undocumented alien
[8 USC 1324(a)(1)(A)(iii)]
Count.6: Conspiracy to transport an undocumented alien within the United States
[8 USC 1324 (a)(1)(A)(ii) and (v)(I)]
Counts. 7-9: Transport and Attempt to transport an undocumented alien within the United States for financial
gain [8 USC 1324(a)(1)(A)(ii)]
Count 10: Possession of Firearm and Ammunition by a person having been convicted of a crime punishable
by imprisonment for a term exceeding one year [18 USC 922(g)(1), 924(a)(2)]

Notice of Forfeiture

TOTAL COUNTS: 10

PENALTY:

Counts.1-5: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment, \$5,000 special assessment, not more than
a three (3)-year term of supervised release [Each Count]
Counts.6-9: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment, \$5,000 special assessment, not more than
a three (3)-year term of supervised release [Each Count]
Count. 10: 0 to 10 years and/or \$250,000 Fine, \$100 special assessment, Not more than a three (3)-year term of
supervised release

In Jail:

On Bond:

Name & Address of Surety:

No Arrest: